

L ELECTRONIC SERVICE - Ito v. Sam's Club Paulding County State Court CAN 23-SV-000094 - Supplement to
From: Anne Rogers
Sent: Monday, January 22, 2024 10:48 AM
To: 'Matthew Momtahan'; Jennie E. Rogers
Cc: 'Jessica Momtahan'; Stephanie@MomtahanLaw.com; brianna@momtahanlaw.com
Subject: RE: STATUTORY ELECTRONIC SERVICE - Ito v. Sam's Club, Paulding
County State Court
CAN: 23-SV-000094 - Supplement to Plaintiff's Discovery Responses

Received and downloaded; thanks so much!

Anne Rogers
Paralegal to Jennie E. Rogers
McLain & Merritt, P.C.
3445 Peachtree Road, NE, Suite 500
Atlanta, Georgia 30326

From: Matthew Momtahan <matthew@momtahanlaw.com>
Sent: Monday, January 22, 2024 9:51 AM
To: Anne Rogers <a Rogers@mmatllaw.com>; Jennie E. Rogers <jrogers@mmatllaw.com>
Cc: 'Jessica Momtahan' <jessica@momtahanlaw.com>; Stephanie@MomtahanLaw.com;
brianna@momtahanlaw.com
Subject: RE: STATUTORY ELECTRONIC SERVICE - Ito v. Sam's Club, Paulding County
State Court CAN: 23-
SV-000094 - Supplement to Plaintiff's Discovery Responses

Good morning,

Try this one:

<https://www.dropbox.com/scl/fo/mrytcfzjfn9thinkgx00i/h?rlkey=0mrhsc2l134ifl1w5o172nran&dl=0>

Please let me know if it doesn't work.

Thank you.

Regards,

Matthew Momtahan
***Please remember to REPLY ALL when replying to any and all emails from our
office***

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From: Anne Rogers <arogers@mmatllaw.com>
Sent: Monday, January 22, 2024 8:34 AM
To: 'Matthew Momtahan' <matthew@mamtahanlaw.com>; Jennie E. Rogers <jrogers@mmatllaw.com>
Cc: Jessica Momtahan <jessica@mamtahanlaw.com>; Stephanie@MomtahanLaw.com; brianna@mamtahanlaw.com
Subject: RE: STATUTORY ELECTRONIC SERVICE - Ito v. Sam's Club, Paulding County State Court CAN: 23-SV-000094 - Supplement to Plaintiff's Discovery Responses

Good morning,

Unfortunately the link seems like it isn't working; could you please resend?

Thank you,

ELECTRONIC SERVICE - Ito v. Sam's Club Paulding County State Court CAN 23-SV-000094 - Supplement to Anne

Anne Rogers
Paralegal to Jennie E. Rogers
McLain & Merritt, P.C.
3445 Peachtree Road, NE, Suite 500
Atlanta, Georgia 30326

From: Matthew Momtahan <matthew@momtahanlaw.com>
Sent: Friday, January 19, 2024 1:49 PM
To: Jennie E. Rogers <jrogers@mmatllaw.com>; Anne Rogers <a Rogers@mmatllaw.com>
Cc: Jessica Momtahan <jessica@momtahanlaw.com>; Stephanie@MomtahanLaw.com;
brianna@momtahanlaw.com
Subject: STATUTORY ELECTRONIC SERVICE - Ito v. Sam's Club, Paulding County State
Court CAN: 23-SV-
000094 - Supplement to Plaintiff's Discovery Responses

Jennie,

As I emailed back in December, we have been having issues collecting all of Ms. Ito's medical records and bills.

We finally believe that we received everything. Our supplementation can be download from here:
<https://www.dropbox.com/scl/fo/mrytcfzjfn9thinkgx00i/h?rlkey=7g6r2fmsxwak66rzrxzf159n&dl=0>.

Unfortunately, there may be some duplicates in this production of bills and records that were previously produced back in July.

Please do not hesitate to contact me if you have any questions.

Thank you.

Regards,

Matthew Momtahan
Please remember to REPLY ALL when replying to any and all emails from our office

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small organizations from malicious activity, human error and technology failure;
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Carolyn Ito - Special Damages Itemization - Date of Loss - 12/05/2021

Total Expenses		
Wellstar Health System	ER Visit, CT Scan, X-ray	\$8,472.00
The Bortolazzo Group, LLC	ED Visit	\$1,400.00
Integrated Healthcare Center of Hiram	Office Visit, X-ray, Therapy Visit	\$9,010.00
Elite Radiology of Georgia, LLC	MRI	\$1,950.00
Medici Medical Arts, LLC	Office Visit, Injection, Anesthesia	\$20,320.98
Medici Surgical Center COBB, LLC	Surgical Procedures	\$23,734.90
Benchmark Physical Therapy-Powder Springs	Physical Therapy, Therapy Visit	\$8,410.50
Total		\$73,298.38

Wellstar Health System		
12/05/2021	ER Visit, CT Scan, X-ray	\$8,472.00
Total		\$8,472.00

The Bortolazzo Group, LLC		
12/05/2021	Emergency Department Visit	\$1,400.00
Total		\$1,400.00

Integrated Healthcare Center of Hiram		
12/15/2021-03/07/2022	Office Visit, X-ray, Therapy Visit	\$9,010.00
Total		\$9,010.00

Elite Radiology of Georgia, LLC		
01/30/2022	MRI of Cervical Spine	\$1,950.00
Total		\$1,950.00

Medici Medical Arts, LLC		
03/25/2022	Office Visit	\$881.60
04/04/2022	Office Visit	\$603.44
04/12/2022	Introduction/Injection of Anesthetic Agent	\$1,555.12
04/12/2022	Introduction/Injection of Anesthetic Agent	\$774.00
04/25/2022	Office Visit	\$603.44
05/24/2022	Office Visit	\$603.44
06/08/2022	Office Visit	\$603.44
07/18/2022	Office Visit	\$603.44
08/30/2022	Office Visit	\$603.44
09/26/2022	Office Visit	\$603.44
10/05/2022	Introduction/Injection of Anesthetic Agent	\$1,555.12
10/05/2022	Introduction/Injection of Anesthetic Agent	\$774.00
10/05/2022	Introduction/Injection of Anesthetic Agent	\$779.76
10/17/2022	Office Visit	\$603.44
11/14/2022	Office Visit	\$366.56
01/04/2023	Office Visit	\$603.44
01/26/2023	Office Visit	\$603.44
03/29/2023	Office Visit	\$603.44
05/02/2023	Office Visit	\$603.44
05/10/2023	Lumbar-Sacral Orthosis	\$1,821.54
06/12/2023	Office Visit	\$603.44
06/14/2023	Introduction/Injection of Anesthetic Agent	\$1,856.72
06/14/2023	Introduction/Injection of Anesthetic Agent	\$804.96
06/14/2023	Anesthesia	\$100.00
06/19/2023	Office Visit	\$603.44
08/02/2023	Office Visit	\$603.44

Total		\$20,320.98
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Medici Surgical Center COBB, LLC		
04/12/2022	Medial Branch Block/Facet, Cervical/Thoracic	\$3,390.70
04/12/2022	Medical Branch Block/Facet 2nd Cervical/Thoracic	\$3,390.70
10/05/2022	Introduction/Injection of Anesthetic Agent	\$3,390.70
10/05/2022	Introduction/Injection of Anesthetic Agent	\$3,390.70
10/05/2022	Introduction/Injection of Anesthetic Agent	\$3,390.70
06/14/2023	Introduction/Injection of Anesthetic Agent	\$3,390.70
06/14/2023	Introduction/Injection of Anesthetic Agent	\$3,390.70
Total		\$23,734.90

Benchmark Physical Therapy-Powder Springs		
12/14/2022-05/16/2023	Physical Therapy, Therapy Visit	\$8,410.50
Total		\$8,410.50